

EXHIBIT A

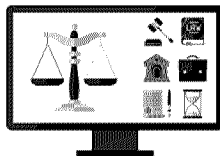
(/)

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DISTRICT CLERK

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IN THE NEWS

[\(/district-clerk/online-case-information\)](/district-clerk/online-case-information)[Online Case Information \(/district-clerk/online-case-information\)](/district-clerk/online-case-information)You are here: [Home \(/\)](#) » [District Clerk \(/district-clerk\)](/district-clerk) » [Online Case Information](#)

Online Case Information

Loading Online Case Information...

Details

Updated : Wednesday, November 27, 2019 4:46:03 AM

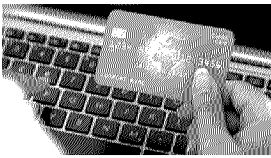
[New Search \(/OnlineCaseInformationWeb/\)](#)[Request Documents \(https://www.traviscountytexas.gov/district-clerk/records-request\)](https://www.traviscountytexas.gov/district-clerk/records-request)

Cause Number	D-1-GN-19-007365
Case Status	PENDING
Style	TABORS V. MONEY SOURCE INC
Filed Date	10/21/2019
Hearing Date	--

Attorney	Type	Full/Business Name	First Name	Middle Name
LEEDIKER KENT MASON	PLAINTIFF		TEDDY	RAY

Event Date	Party Type	Description
11/7/2019	DF	EXECUTED SERVICE
10/28/2019	DF	ISS:CITATION
10/21/2019	PL	OTHER FILING
10/21/2019	PL	AFFIDAVIT INABILITY PAY COSTS
10/21/2019	PL	ORIGINAL PETITION/APPLICATION

[New Search \(/OnlineCaseInformationWeb/\)](#)



(/district-clerk/online-payments)

Civil Court Fees and Fines

(/district-clerk/online-payments)



(/district-clerk/passport)

Larger passport

location: 5501 Airport Blvd (North Entrance), Rm 220, Austin, TX 78751
(/district-clerk/passport)



(<https://www.traviscountytexas.gov/>)

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Employees

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Retirees (/human-resources/retirees) | About
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(/open-records) | Webmaster (/its/web-services) | Notice of Privacy Practices
(/hipaa)

P.O. Box 1748, Austin, TX 78767 | (512) 854-9020



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EXHIBIT B

EXHIBIT B-1

10/21/2019 12:00 AM

Velva L. Price
 District Clerk
 Travis County
 D-1-GN-19-007365
 Ruben Tamez

D-1-GN-19-007365

Cause No. _____

TEDDY RAY TABORS,

PLAINTIFF

vs.

THE MONEY SOURCE INC.

DEFENDANT

§ IN THE DISTRICT COURT

§

§

§

§ OF TEAVIS COUNTY, TEXAS

§

§

§ 353RD

§ _____ JUDICIAL DISTRICT

PLAINTIFF'S ORIGINAL PETITION CONTESTING FORECLOSURE

Teddy Ray Tabors, Plaintiff, files this petition and in support, shows the Court as follows.

I. DISCOVERY

1. Plaintiff intends to conduct discovery under Level 2 and affirmatively plead that this suit is not governed by the expedited-actions process in TRCP 169 because the value of the residence the subject of this proceeding is in excess of \$100,000.

II. PARTIES

2. Plaintiff is a resident of Travis County, Texas.

3. Defendant is The Money Source Inc. Defendant is a business entity which has registered as a foreign for profit corporation doing business in Texas. It can be served by

serving its registered agent, CT Corporation System, 1999 Bryan St., Suite 900, Dallas, TX 75201-3136.

III. JURISDICTION AND VENUE

4. The amount in controversy is within the jurisdictional limits of the Court. Venue is proper because the cause of action arose in Travis County, Texas.

IV. FACT STATEMENT

5. Defendant The Money Source Inc. filed an application with the 419th District Court, Travis County, Texas, (Cause No. D-1-GN-19-005705) requesting permission to foreclose on Plaintiff's home.

6. The requested foreclosure is on a reverse mortgage lien. The foreclosure is due to Plaintiff being unable due to hardship to timely pay the property taxes due on the property.

7. The application for an expedited order under Rule 736 on a Reverse Mortgage Loan filed by The Money Source Inc. states that as of August 31, 2019 the total amount to pay off the loan agreement is \$241,465.39. The application states the amount required to cure the default is \$6,001.23.

8. Plaintiff has been unable to determine whether the stated amount to pay off the loan or the stated amount required to cure the default are correct.

V. CAUSES OF ACTION

ISSUE OF AMOUNT OWED

9. Plaintiff is filing this preceding pursuant to Rule 736.11 of the Texas Rules of Civil Procedure. Plaintiff is requesting the automatic stay of the foreclosure process until such time as the issue referenced in this preceding is resolved.

10. Plaintiff intends to pay either the amount required to cure the default or the amount required to pay off the loan agreement prior to any foreclosure sale. However, Plaintiff is disputing the amount required to cure the default and the total amount required to pay off the loan agreement. To date Plaintiff has been unable to determine if the alleged amounts are correct.

VI. REQUEST FOR RELIEF

11. Plaintiff requests the Court stay the foreclosure proceedings and upon motion, to dismiss the pending foreclosure proceeding.

12. Plaintiff further request court costs, litigation expenses and any other relief to which Plaintiff may be entitled.

Respectfully submitted,



Kent M. Leediker
State Bar No. 12074700

1104 Nueces, Suite 201
Austin, TX 78701
512-478-7463
512-478-1790 (fax)
kentleediker@gmail.com

Attorney for Plaintiff

EXHIBIT B-2

10/21/2019 12:00 AM

Velva L. Price
District Clerk
Travis County
D-1-GN-19-007365
Ruben Tamez

NOTICE: THIS DOCUMENT CONTAINS SENSITIVE DATA

D-1-GN-19-007365

No. _____

§ 353RD DISTRICT COURT

§ TRAVIS COUNTY, TEXAS

§
§
§
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§
§
§
§
§
§**STATEMENT OF INABILITY TO AFFORD PAYMENT OF COURT COSTS**

"My full legal name is Teddy Ray Tabor My birthdate is April 6, 1975. My address is 1012 Green District, Austin My telephone number is 512-731-0096 My e-mail is TT45T@2015@yahoo.com

My Dependents:

The people who depend on me financially are listed below:

Name	Age	Relationship to me
<u>NOT APPLICABLE</u>		

I am being represented in this case for free by an attorney who received my case through a legal aid provider; namely, Volunteer Legal Services of Central Texas. I have attached the certificate the legal aid provider gave me as 'Exhibit: Legal Aid Certificate'.

I receive the following public benefits and/or government entitlements that are based in indigency: [check all that apply]

☒ Food Stamps / SNAP ☒ TANF ☒ Medicaid ☒ CHIP
☒ SSI ☒ WIC ☒ AABD ☒ Public Housing or Section 8 housing
☒ Low-Income Energy Assistance ☒ Emergency Assistance
☒ Telephone Lifeline ☒ Community Care via DADS
☒ LIS in Medicare (Extra Help) ☒ Needs Based VA Pension
☒ Child Care Assistance under Child Care and Development Block Grant

Daniel Smith

N/A County Assistance, County Health Care or General Assistance (GA)

N/A Other: _____

or: N/A I do not receive needs based benefits.

I receive the following in monthly income:

\$ 0 in monthly wages. I work as a _____ for _____.

\$ 0 in monthly unemployment. I have been unemployed since _____.

\$ 0 in public benefits per month.

\$ 0 from other people in my household each month.

\$ 864 from _____ Retirement and/or Pension _____ Tips and/or bonuses
 _____ Disability _____ Worker's Compensation _____ Worker's Comp.
864 Social Security _____ Military Housing
 _____ Dividends, Interest and/or Royalties
 _____ Child Support and/or spousal support
 _____ My spouse's income or income from another member of my
 household

\$ 0 Other jobs/sources of income: _____.

\$ 864 is my **TOTAL MONTHLY INCOME.**

My Property includes:

Value

Cash \$ _____

Bank accounts and other financial assets: \$ 25,00

Vehicles (Cars, Trucks or boats) (Year/Make):

1. NONE \$ _____

2. _____ \$ _____

Other property (Jewelry, stocks, land, another house, etc):

1. NONE \$ _____

2. _____ \$ _____

TOTAL VALUE OF PROPERTY: \$ 25,00

My monthly expenses are:

Rent/Mortgage/Maintenance:	\$ _____
Food and household supplies:	\$ <u>415,00</u>
Utilities and telephone:	\$ <u>735</u>
Clothing/Laundry:	\$ <u>10</u>
Medical/Dental:	\$ <u>35</u>
Insurance (life, health, auto, etc.):	\$ <u>—</u>
School and Child Care:	\$ <u>—</u>
Transportation, auto repair, gas:	\$ <u>53</u>

EXHIBIT B-3

Velva L. Price
District Clerk
Travis County
D-1-GN-19-007365
Ruben Tamez

No.

TRAVIS COUNTY, TEXAS

512-478-7463

EXHIBIT B-4

C I T A T I O N
T H E S T A T E O F T E X A S
CAUSE NO. D-1-GN-19-007365

TEDDY RAY TABORS

, Plaintiff

vs.

THE MONEY SOURCE, INC.

Defendant

TO: THE MONEY SOURCE INC
BY SERVING ITS REGISTERED AGENT CT CORPORATION SYSTEM
1999 BRYAN STREET, SUITE 900
DALLAS, TEXAS 75201-3136

Defendant, in the above styled and numbered cause:

YOU HAVE BEEN SUED. You may employ an attorney. If you or your attorney do not file a written answer with the clerk who issued this citation by 10:00 A.M. on the Monday next following the expiration of twenty days after you were served this citation and petition, a default judgment may be taken against you.

Attached is a copy of the PLAINTIFFS ORIGINAL PETITION CONTESTING FORCLOSURE of the PLAINTIFF in the above styled and numbered cause, which was filed on OCTOBER 22, 2019 in the 353RD JUDICIAL DISTRICT COURT of Travis County, Austin, Texas.

ISSUED AND GIVEN UNDER MY HAND AND SEAL of said Court at office, October 28, 2019.

REQUESTED BY:
KENT MASON LEEDIKER
1104 NUECES ST STE 201
AUSTIN, TX 78701
BUSINESS PHONE: (512) 478-7463 FAX: (512) 478-1790



Velva L. Price
Velva L. Price
Travis County District Clerk
Travis County Courthouse
1000 Guadalupe, P.O. Box 679003 (78767)
Austin, TX 78701

PREPARED BY: RUBEN TAMEZ

-- -- -- -- -- R E T U R N -- -- -- -- --

Came to hand on the _____ day of _____, _____ at _____ o'clock _____ M., and executed at _____ within the County of _____ on the _____ day of _____, _____, at _____ o'clock _____ M., by delivering to the within named _____, each in person, a true copy of this citation together with the PLAINTIFFS ORIGINAL PETITION CONTESTING FORCLOSURE, LAWYER REFERRAL accompanying pleading, having first attached such copy of such citation to such copy of pleading and endorsed on such copy of citation the date of delivery.

Service Fee: \$ _____

Sheriff / Constable / Authorized Person

Sworn to and subscribed before me this the _____

By: _____

_____ day of _____, _____.

Printed Name of Server_____
Notary Public, THE STATE OF TEXAS_____
County, Texas

D-1-GN-19-007365

CONSTABLE

P01 - 000085108

☐ Original☐ Service Copy

EXHIBIT B-5

C I T A T I O N
T H E S T A T E O F T E X A S
C A U S E N O . D - 1 - G N - 1 9 - 0 0 7 3 6 5

TEDDY RAY TABORS

vs.

THE MONEY SOURCE, INC.

, Plaintiff

, Defendant

TO: THE MONEY SOURCE INC
BY SERVING ITS REGISTERED AGENT CT CORPORATION SYSTEM
1999 BRYAN STREET, SUITE 900
DALLAS, TEXAS 75201-3136

Defendant, in the above styled and numbered cause:

YOU HAVE BEEN SUED. You may employ an attorney. If you or your attorney do not file a written answer with the clerk who issued this citation by 10:00 A.M. on the Monday next following the expiration of twenty days after you were served this citation and petition, a default judgment may be taken against you.

Attached is a copy of the PLAINTIFFS ORIGINAL PETITION CONTESTING FORCLOSURE of the PLAINTIFF in the above styled and numbered cause, which was filed on OCTOBER 31, 2019 in the 353RD JUDICIAL DISTRICT COURT of Travis County, Austin, Texas.

ISSUED AND GIVEN UNDER MY HAND AND SEAL of said Court at office, October 28, 2019.

REQUESTED BY:
KENT MASON LEEDIKER
1104 NUECES ST STE 201
AUSTIN, TX 78701
BUSINESS PHONE: (512) 478-7463 FAX: (512) 478-1790



[Signature]
Velva L. Price
Travis County District Clerk
Travis County Courthouse
1000 Guadalupe, P.O. Box 679003 (78767)
Austin, TX 78701

PREPARED BY: RUBEN TAMEZ

R E T U R N

Came to hand on the _____ day of _____, _____ at _____ o'clock _____ M., and executed at _____ within the County of _____ on the _____ day of _____, _____, at _____ o'clock _____ M., by delivering to the within named _____, each in person, a true copy of this citation together with the PLAINTIFFS ORIGINAL PETITION CONTESTING FORCLOSURE, LAWYER REFERRAL accompanying pleading, having first attached such copy of such citation to such copy of pleading and endorsed on such copy of citation the date of delivery.

Service Fee: \$ _____

Sworn to and subscribed before me this the _____ day of _____, _____.

[Signature]
Constable Pct. 5, Travis County, Texas



Sheriff / Constable / Authorized Person

By: _____

Printed Name of Server _____

_____ County, Texas

Notary Public, THE STATE OF TEXAS

D-1-GN-19-007365

☐ Original☐ Service Copy

CONSTABLE

P01 - 000085108

Cause No.: D1GN19007365

Plaintiff:

TEDDY RAY TABORS

Defendant:

THE MONEY SOURCE INC

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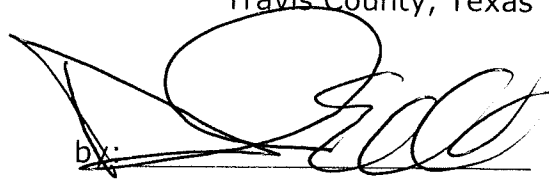
In the 353rd District Court

TRAVIS County

Officer's Return

Came to hand October 28, 2019 at 1:22 P.M. and executed in Dallas County, Texas, on October 31, 2019 at 5:00 P.M. by delivering to THE MONEY SOURCE INC, by delivering to Ct Corporation System AND SIGNED BY ANTOINETTE WILLIAMS at 1999 BRYAN STREET STE 900 DALLAS TX 75201, by certified mail, number 7018 3090 0002 0429 9103 return receipt requested, a true copy of the Citation together with a copy of the Plaintiff's Original Petition Contesting Foreclosure, Lawyer Referral.

Carlos B. Lopez,
Travis County Constable Precinct 5
Travis County, Texas

by: 
Deputy

7018 3090 0002 0429 9103

U.S. Postal Service™
CERTIFIED MAIL® RECEIPT
Domestic Mail Only

For delivery information, visit our website at www.usps.com®.

OFFICIAL USE

Certified Mail Fee	\$
Extra Services & Fees (check box, add fee as appropriate)	
<input type="checkbox"/> Return Receipt (hardcopy)	\$
<input type="checkbox"/> Return Receipt (electronic)	\$
<input type="checkbox"/> Certified Mail Restricted Delivery	\$
<input type="checkbox"/> Adult Signature Required	\$
<input type="checkbox"/> Adult Signature Restricted Delivery	\$
Postage	\$
Total Postage and Fees	

Postmark Here
OCT 28 2019

D1GN19007365-1
The Money Source Inc
Ct Corporation System
1999 BRYAN STREET STE 900
DALLAS TX 75201

See back for instructions

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY		
<p>■ Complete items 1, 2, and 3.</p> <p>■ Print your name and address on the reverse so that we can return the card to you.</p> <p>■ Attach this card to the back of the mailpiece, or on the front if space permits.</p> <p>1. Article Addressed to:</p> <p>D1GN19007365-1 The Money Source Inc Ct Corporation System 1999 BRYAN STREET STE 900 DALLAS TX 75201</p> <p>2. Article Number (Transfer from service label) 7018 3090 0002 0429 9103</p>	<p>A. Signature <i>Antoinette Williams</i></p> <p>B. Received by (Print Name) Antoinette Williams</p> <p>C. Date of Delivery 10/28/2019</p> <p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No</p> <p>3. Service Type</p> <table border="0"> <tr> <td> <input type="checkbox"/> Adult Signature <input type="checkbox"/> Adult Signature Restricted Delivery <input type="checkbox"/> Certified Mail® <input type="checkbox"/> Certified Mail Restricted Delivery <input type="checkbox"/> Collect on Delivery <input type="checkbox"/> Collect on Delivery Restricted Delivery <input type="checkbox"/> Insured Mail <input type="checkbox"/> Insured Mail Restricted Delivery (over \$500) </td> <td> <input type="checkbox"/> Priority Mail Express® <input type="checkbox"/> Registered Mail™ <input type="checkbox"/> Registered Mail Restricted Delivery <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Signature Confirmation™ <input type="checkbox"/> Signature Confirmation Restricted Delivery </td> </tr> </table>	<input type="checkbox"/> Adult Signature <input type="checkbox"/> Adult Signature Restricted Delivery <input type="checkbox"/> Certified Mail® <input type="checkbox"/> Certified Mail Restricted Delivery <input type="checkbox"/> Collect on Delivery <input type="checkbox"/> Collect on Delivery Restricted Delivery <input type="checkbox"/> Insured Mail <input type="checkbox"/> Insured Mail Restricted Delivery (over \$500)	<input type="checkbox"/> Priority Mail Express® <input type="checkbox"/> Registered Mail™ <input type="checkbox"/> Registered Mail Restricted Delivery <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Signature Confirmation™ <input type="checkbox"/> Signature Confirmation Restricted Delivery
<input type="checkbox"/> Adult Signature <input type="checkbox"/> Adult Signature Restricted Delivery <input type="checkbox"/> Certified Mail® <input type="checkbox"/> Certified Mail Restricted Delivery <input type="checkbox"/> Collect on Delivery <input type="checkbox"/> Collect on Delivery Restricted Delivery <input type="checkbox"/> Insured Mail <input type="checkbox"/> Insured Mail Restricted Delivery (over \$500)	<input type="checkbox"/> Priority Mail Express® <input type="checkbox"/> Registered Mail™ <input type="checkbox"/> Registered Mail Restricted Delivery <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Signature Confirmation™ <input type="checkbox"/> Signature Confirmation Restricted Delivery		

9590 9402 3691 8060 3371 83

PS Form 3871 July 2015 PSN 7530-02-000-9053

Domestic Return Receipt